

John D. Fiero (*admitted pro hac vice*)
 Jason H. Rosell (*admitted pro hac vice*)
 PACHULSKI STANG ZIEHL & JONES LLP
 One Sansome Street, 34th Floor, Suite 3430
 San Francisco, CA 94104
 Tel: (415) 263-7000
 E-mail: jfiero@pszjlaw.com
 jrosell@pszjlaw.com

Matthew C. Zirzow (NV Bar No. 7222)
 Zachariah Larson (NV Bar No. 7787)
 LARSON & ZIRZOW LLC
 850 E. Bonneville Ave.
 Las Vegas, NV 89101
 Tel: (702) 382-1170
 Email: mzirzow@lzlawnv.com
 zlarson@lzlawnv.com

[Proposed] Counsel to the Official
 Committee of Unsecured Creditors

[Proposed] Counsel to the Official
 Committee of Unsecured Creditors

**UNITED STATES BANKRUPTCY COURT
 DISTRICT OF NEVADA**

In re:

 MUSCLEPHARM CORPORATION,

 Debtor.

Case No. 22-14422-nmc
 Chapter 11

 Date: February 9, 2023
 Time: 10:30 a.m.

**SECOND STIPULATION TO CONTINUE BRIEFING DEADLINES RE: FINAL
 HEARING RE: DEBTOR’S MOTION FOR ENTRY OF INTERIM AND FINAL
 ORDERS: (I) AUTHORIZING DEBTOR TO OBTAIN POST-PETITION FINANCING,
 (II) GRANTING PRIMING LIENS AND ADMINISTRATIVE EXPENSE CLAIMS, (III)
 AUTHORIZING THE DEBTOR’S USE OF CASH COLLATERAL, (IV) MODIFYING
THE AUTOMATIC STAY, AND (V) GRANTING RELATED RELIEF**

The Official Committee of Unsecured Creditors (the “Committee”) and MusclePharm Corporation, a Nevada corporation (the “Debtor” and collectively the “Parties”), by and through their respective undersigned counsel, hereby stipulate and agree (the “Second Stipulation”) as follows:

1. On December 15, 2022 (the “Petition Date”), the Debtor filed its voluntary petition under chapter 11 of title 11 of the United States Code (the “Bankruptcy Code”), thereby commencing the above-referenced bankruptcy case.

2. On January 3, 2023, the Debtor filed its *Emergency Motion for Entry of Interim and Final Orders: (I) Authorizing Debtor to Obtain Post-Petition Financing, (II) Granting Priming Liens and Administrative Expense Claims, (III) Authorizing the Debtor’s Use of Cash Collateral, (IV) Modifying the Automatic Stay, and (V) Granting Related Relief* (the “Motion”) [ECF No. 33].

1 3. On January 4, 2023, the United States Trustee's Office through the United States
2 Department of Justice, appointed the members of the official committee of unsecured creditors
3 (collectively, the "Committee"), and the law firms of Pachulski Stang Ziehl & Johnes LLP and
4 Larson & Zirzow, LLC are proposed counsel to the Committee.

5 4. On January 9, 2023, the Court entered the first interim order on the Motion [ECF
6 No. 74], and on January 23, 2023, entered a second interim order with respect to approval of the
7 Motion on an interim basis, and setting a final hearing date on the Motion for February 9, 2023 at
8 10:30 a.m. (the "Final Hearing") [ECF No. 105].

9 5. On or about January 25, 2023, the Parties entered into the first stipulation ("First
10 Stipulation") request the extension of the briefing periods regarding Debtor's Motion, which First
11 Stipulation was approved by an order entered on January 26, 2023 [ECF No. 158].

12 6. At the request of the Committee's counsel for an additional extension, the Parties
13 have conferred and agreed to adjust the briefing schedule as set forth in the First Stipulation
14 regarding the Motion for the Final Hearing.

15 NOW, THEREFORE, the Parties request that the Court enter the proposed Order attached
16 hereto as Exhibit 1, thereby approving this Second Stipulation and directing that the Committee's
17 opposition to the final approval of the Motion be extended to February 3, 2023, and the Debtor's
18 reply to remain due on February 7, 2023.

19 ...

20 ...

21 ...

22

23

24

25

26

27

28

1 Dated: February 2, 2023.

2
3 BY: /s/ Matthew C. Zirzow
4 LARSON & ZIRZOW LLC
5 MATTHEW C. ZIRZOW, ESQ.
6 Nevada Bar No. 7222
7 ZACHARIAH LARSON, ESQ.
8 Nevada Bar No. 7787
9 850 E. Bonneville Ave.
10 Las Vegas, NV 89101
11 Tel: (702) 382-1170
12 Email: mzirzow@lzlawnv.com
13 zlarson@lzlawnv.com

By: /s/ Bryan A. Lindsey
SCHWARTZ LAW, PLLC
SAMUEL A. SCHWARTZ, ESQ.
Nevada Bar No. 10985
Email: saschwartz@nvfirm.com
BRYAN A. LINDSEY, ESQ.
Nevada Bar No. 10662
Email: blindsey@nvfirm.com
601 E. Bridger Ave.
Las Vegas, NV 89101

Counsel for Debtor

14 -and-

15
16 PACHULSKI STANG ZIEHL & JONES LLP
17 JOHN D. FIERO (*admitted pro hac vice*)
18 JASON H. ROSELL (*admitted pro hac vice*)
19 One Sansome Street, 34th Floor, Suite 3430
20 San Francisco, CA 94104
21 Tel: (415) 263-7000
22 E-mail: jfiero@pszjlaw.com
23 jrosell@pszjlaw.com

24 [Proposed] Counsel to the Official
25 Committee of Unsecured Creditors
26
27
28

EXHIBIT 1

EXHIBIT 1

PACHULSKI STANG ZIEHL & JONES LLP
John D. Fiero (*admitted pro hac vice*)
Jason H. Rosell (*admitted pro hac vice*)
One Sansome Street, 34th Floor, Suite 3430
San Francisco, CA 94104
Tel: (415) 263-7000
E-mail: jfiero@pszjlaw.com
jrosell@pszjlaw.com

LARSON & ZIRZOW LLC
Matthew C. Zirzow (NV Bar No. 7222)
Zachariah Larson (NV Bar No. 7787)
850 E. Bonneville Ave.
Las Vegas, NV 89101
Tel: (702) 382-1170
Email: mzirzow@lzlawnv.com
zlarson@lzlawnv.com

[Proposed] Counsel to the Official
Committee of Unsecured Creditors

[Proposed] Counsel to the Official
Committee of Unsecured Creditors

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA**

In re:

MUSCLEPHARM CORPORATION,

Debtor.

Case No. 22-14422-nmc
Chapter 11

Date: February 9, 2023
Time: 10:30 a.m.

**ORDER APPROVING SECOND STIPULATION TO CONTINUE BRIEFING
DEADLINES RE: FINAL HEARING RE: DEBTOR'S MOTION FOR ENTRY OF
INTERIM AND FINAL ORDERS: (I) AUTHORIZING DEBTOR TO OBTAIN POST-
PETITION FINANCING, (II) GRANTING PRIMING LIENS AND ADMINISTRATIVE
EXPENSE CLAIMS, (III) AUTHORIZING THE DEBTOR'S USE OF CASH
COLLATERAL, (IV) MODIFYING THE AUTOMATIC STAY,
AND (V) GRANTING RELATED RELIEF**

The Official Committee of Unsecured Creditors (the "Committee") and MusclePharm Corporation (the "Debtor" and collectively the "Parties"), by and through their respective undersigned counsel, having filed their *Second Stipulation to Continue Briefing Deadlines Re: Final Hearing on Debtor's Motion for Entry of Interim and Final Orders: (I) Authorizing Debtor*

1 to Obtain Post-Petition Financing, (II) Granting Priming Liens and Administrative Expense
2 Claims, (III) Authorizing the Debtor's Use of Cash Collateral, (IV) Modifying the Automatic
3 Stay, and (V) Granting Related Relief (the "Second Stipulation")¹; the Court having reviewed
4 and considered the Stipulation; and good cause appearing:

5 **IT IS HEREBY ORDERED:**

6 1. The Second Stipulation is APPROVED; and

7 2. The Committee's opposition to final approval of the *Emergency Motion for Entry*
8 *of Interim and Final Orders: (I) Authorizing Debtor to Obtain Post-Petition Financing, (II)*
9 *Granting Priming Liens and Administrative Expense Claims, (III) Authorizing the Debtor's Use*
10 *of Cash Collateral, (IV) Modifying the Automatic Stay, and (V) Granting Related Relief* [ECF
11 No. 33] is extended to February 3, 2023, and the Debtor's reply will remain due on February 7,
12 2023.

13 **IT IS SO ORDERED.**

14 ...

15 ...

16 ...

17
18
19
20
21
22
23
24
25
26
27

¹ Unless otherwise indicated, all capitalized terms herein shall have the same meaning as set forth in the Stipulation.
28

1 BY: /s/ Matthew C. Zirzow
2 LARSON & ZIRZOW LLC
3 MATTHEW C. ZIRZOW, ESQ.
4 Nevada Bar No. 7222
5 ZACHARIAH LARSON, ESQ.
6 Nevada Bar No. 7787
7 850 E. Bonneville Ave.
8 Las Vegas, NV 89101
9 Tel: (702) 382-1170
10 Email: mzirzow@lzlawnv.com
11 zlarson@lzlawnv.com

By: /s/ Bryan A. Lindsey
SCHWARTZ LAW, PLLC
SAMUEL A. SCHWARTZ, ESQ.
Nevada Bar No. 10985
Email: saschwartz@nvfirm.com
BRYAN A. LINDSEY, ESQ.
Nevada Bar No. 10662
Email: blindsey@nvfirm.com
601 E. Bridger Ave.
Las Vegas, NV 89101

Counsel for Debtor

8 -and-

9 PACHULSKI STANG ZIEHL & JONES LLP
10 JOHN D. FIERO (*admitted pro hac vice*)
11 JASON H. ROSELL (*admitted pro hac vice*)
12 One Sansome Street, 34th Floor, Suite 3430
13 San Francisco, CA 94104
14 Tel: (415) 263-7000
15 E-mail: jfiero@pszjlaw.com
16 jrosell@pszjlaw.com

17 [Proposed] Counsel to the Official
18 Committee of Unsecured Creditors

19 ###